ORIGINAL FILE

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

RECEIVED

JUL 2 3 1992

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference for 0+ InterLATA Calls CC Docket No. 92-77

MOTION FOR EXTENSION OF TIME

The American Public Communications Council ("APCC") hereby requests that the time for filing reply comments in these proceedings on the issue of billed party preference be extended for 21 days, until August 27, 1992. The parties listed below have authorized APCC's attorneys to say that they join APCC's request for an extension of time.

American Hotel & Motel Association
California Payphone Association
Capital Network System, Inc.
Independent Payphone Association of New York, Inc.
Intellicall, Inc.
LinkUSA Corporation
MessagePhone, Inc.
Michigan Public Service Commission Staff
Midwest Independent Coin Payphone Association
Northwest Pay Phone Association
One Call Communications, Inc. d/b/a Opticom
Pennsylvania Public Utility Commission
Pilgrim Telephone, Inc.
Value-Added Communications, Inc.

In addition, the Airports Association Council International, N.A. has authorized APCC to state that it supports APCC's motion. More than 55 parties have filed comments in these proceedings totalling more than 900 pages. In addition, more than 30 letter

No. of Copies rec'd_ List A B C D E comments have been filed. These comments address some 12 separate questions on which the Commission's Notice of Proposed Rulemaking requested comment. Many of the issues addressed in the comments are highly technical in nature and require time-consuming analysis. In addition, numerous parties have submitted cost estimates for implementation of billed party preference, and these cost data require careful review. Apart from these particular areas of technical complexity, the proceeding involves numerous complex and overlapping issues of policy on which a variety of different perspectives can be and have been brought to bear.

The task of reviewing and analyzing the comments on these various issues, and preparing replies thereto, is formidable. The public interest will be served by allowing interested parties an additional 21 days to prepare reply comments, so that the Commission can have the benefit of a more complete and comprehensive record concerning the issues raised.

In preparing its motion, APCC has attempted to contact all parties that filed comments (other than letter comments) in these proceedings, and has been successful in contacting roughly 90% of those parties. Of the parties contacted, all except Sprint and Bell Atlantic said they did not object to the grant of the requested extension of time.

For the foregoing reasons, the Commission should grant APCC's motion and allow an additional 21 days, until August 27, 1992, for

the filing of reply comments on the issue of billed party preference.

Respectfully submitted,

Albert H. Kramer Robert F. Aldrich KECK, MAHIN & CATE 1201 New York Avenue, N.W.

Penthouse Suite

Washington, D.C. 20005

(202) 789-3400

Attorneys for the American Public Communications Council

Date: July 23, 1992

c:\WPFILES\APCC\BPPEXTEN.MOT

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion for Extension of Time were mailed, this 23rd day of July, 1992, via First Class Mail, postage prepaid (except as noted), to the parties listed on the attached Service List.

obert F. Aldrich

SERVICE LIST

Chairman Alfred C. Sikes*
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

ATTENTION: Charla M. Rath

Commissioner Sherrie P. Marshall* Federal Communications Commission 1919 M Street, N.W. Room 826 Washington, D.C. 20554

ATTENTION: Kathleen Q. Abernathy

Commissioner Ervin S. Duggan*
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

ATTENTION: Linda L. Oliver

Cheryl A. Tritt*
Federal Communications Commission
1919 M Street, N.W.
Room 500
Washington, D.C. 20554

Commissioner James H. Quello*
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

ATTENTION: William G. Harris

Commissioner Andrew C. Barrett* Federal Communications Commission 1919 M Street, N.W. Room 844 Washington, D.C. 20554

ATTENTION: Madelon A. Kuchera

James D. Schlichting*
Federal Communications Commission
1919 M Street, N.W.
Room 554
Washington, D.C. 20554

Gary Phillips*
Federal Communications Commission
1919 M Street, N.W.
Room 544
Washington, D.C. 20554

^{*} Served via Messenger

John F. Dodd
Brad I. Pearson
Smith, Gill, Fisher & Butts,
a Professional Corporation
One Kansas City Place
1200 Main Street, 35th Floor
Kansas City, MO 64105-2152

Douglas N. Owens 4705 16th St., N.E. Seattle, Washington 98105

Steve Schude President Advanced Payphone Systems, Inc. 535 W. Iron Ave. Suite 122 Mesa, Arizona 85210 Gary Joseph
Vice President-Communications
National Brands, Inc.
d/b/a Sharenet Comm. Co.
4633 West Polk Street
Phoenix, Arizona 85043

Martin A. Mattes Richard L. Goldberg Graham & James One Maritime Plaza Suite 300 San Francisco, CA 94111 Robert C. Dickhaus President Telephone Opting Systems, Inc. 1004 North 14th St., Ste. 106 Leesburg, FL 34748

Keith J. Roland Roland, Fogel, Koblenz & Carr One Columbia Place Albany, New York 12207 Vernell Sturns
Executive Director
Dallas/Forth Worth Int. Air.
P.O. Drawer DFW
Dallas/Fort Worth Airport,
Texas 75261

William M. Barvick 231 Madison Street Jefferson City, MO 65101

Krys T. Bart
Assistant Director
City of Fresno
2401 N. Ashley Way
Fresno, CA 93727-1504

Al Denson
Dir. of Administration
Birmingham Airport Auth.
5900 Airport Highway
Birmingham, Alabama 35212

Robert N. Broadbent Director Clark Cty.-Dept. of Aviation McCarran Int'l. airport P.O. Box 11005 Las Vegas, Nevada 89111

Robert H. Waddle, AAE
Executive Director
Columbia Metro. Airport
P.O. Box 280037
Columbia, S.C. 29228-0037

Jerry L. McMichael, AAE
Executive Vice President
Memphis-Shelby Cty. Air. Auth.
Memphis Int'l. Airport
P.O. Box 30168
Memphis, Tennessee 38130-0168

Emily Regnier
Airport Prop. Dept.
Oakland Int'l. Airport
530 Water St.
Jack London's Waterfront
P.O. Box 2064
Oakland, CA 94604-2064

Brent A. Kitchen Airports Director Tulsa Int'l. Airport P.O. Box 581838 Tulsa, Oklahoma 74158

Angela Gittens
Deputy Dir. of Airports
Airport Commission
P.O. Box 8097
San Francisco Int'l. Airport
San Francisco, CA 94128

Scott R. O'Donnell
Director
County of Allegheny
Dept. of Aviation
Room M 134, Terminal Bldg.
Greater Pittsburgh Int'l. Air.
Pittsburgh, PA 15231

Robert C. White Executive Director Airport Auth. of Washoe Cty. Reno Cannon Int'l. Airport Reno Stead Airport Box 12490 Reno, Nevada 89510 Bern E. Case, AAE Director of Aviation Lubbock Int'l. Airport Route 3, Box 389 Lubbock, TX 79401 Jean L. Kiddoo
Ann P. Morton
Swidler & Berlin, CHTD.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Eileen E. Huggard
Assistant Commissioner
The City of New York
Dept. of Telecomm. & Energy
75 Park Place, 6th Floor
New York, NY 10007

Barney C. Parrella
Sr. Vice President
Economics & Int'l. Affairs
1220 19th Street, N.W.
Suite 200
Washington, D.C. 20036

Brian J. Kinsella
Thomas F. Youngblood
American Hotel & Motel Assoc.
1201 New York Ave., N.W.
Washington, D.C. 20005-3931

Maurice D. Murphy
Associate Director
Harvard University
Off. for Info. Technology
10 Ware St.
Cambridge, MA 02138

Alan J. Thiemann Taylor, Thiemann & Aitken 908 King Street Suite 300 Alexandria, VA 22314

John J. Huber
Counsel
Petroleum Marketers Assoc.
1120 Vermont Ave., N.W.
Suite 1130
Washington, D.C. 20005-3523

Floyd S. Keene
Larry A. Peck
2000 W. Ameritech Center Drive
Room 4H86
Hoffman Estates, IL
60196-1025

Jack A. McLean
President
Richfield Truck Stop
J. Arrow, Inc.
P.O. Box 26, Holy Hill Exit
U.S. 41-45 St. 167 West
Richfield, Wisconsin 53076

John M. Goodman Charles H. Kennedy 1710 H Street, N.W. Washington, D.C. 20006 Martin T. McCue Linda Kent 900 19th Street, N.W. Suite 800 Washington, D.C. 20006-2105

William B. Barfield Richard M. Sbaratta Helen A. Shockey Suite 1800 1155 Peachtree St., N.E. Atlanta, GA 30367-6000

Durward D. Dupre
Richard C. Hartgrove
John Paul Walters, Jr.
1010 Pine St., Room 2114
St. Louis, Missouri 63101

Gail L. Polivy 1850 M Street, N.W. Suite 1200 Washington, D.C. 20036

Rochelle D. Jones Director-Regulatory 227 Church St., 4th Floor New Haven, CT 06510 James P. Tuthill Nancy C. Woolf 140 New Montgomery St. Room 1523 San Francisco, CA 94105

Patrick A. Lee Edward E. Niehoff 120 Bloomingdale Road White Plains, NY 10605

James L. Wurtz 1275 Pennsylvania Ave., N.W. Washington, D.C. 20004

Lawrence E. Sarjeant
Randall S. Coleman
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Lisa M. Zaina General Counsel OPASTCO 2000 K Street, N.W. Suite 205 Washington, D.C. 20006 John B. Mow Advanced Business Communications 4801 Spring Valley Suite 105A Dallas, TX 75244 Richard E. Wiley
Danny E. Adams
Brad E. Mutschelknaus
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006

John F. Dodd
Brad I. Pearson
SMITH, GILL, FISHER & BUTTS
One Kansas City Place
1200 Main Street, 35th Floor
Kansas City, MO 64105-2152

Charles P. Miller General Counsel Value-Added Communications, Inc. 1901 So. Meyers Rd., Suite 530 Oakbrook Terrace, IL 60181

Douglas E. Neel Vice President, Regulatory Affairs MessagePhone, Inc. 5910 N. Central Expressway Suite 1575 Dallas, TX 75206 Randolph J. May
David A. Gross
Elizabeth C. Buckingham
SUTHERLAND, ASBILL & BRENNAN
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004-2404

Benjamin J. Griffin
Lynn E. Shapiro
REED SMITH SHAW & McCLAY
1200 18th Street, N.W.
Washington, DC 20036

John Ligon, Esq. 128 Mount Hebron Avenue P.O. Box 880 Upper Montclair, NH 07043

Judith St. Ledger-Roty
Michael R. Wack
REED SMITH SHAW & McCLAY
1200 18th Street, N.W.
Washington, DC 20036

Randolph J. May Elizabetyh C. Buckingham SUTHERLAND, ASBILL & BRENNAN 1275 Pennsylvania Avenue, N.W. Washington, DC 20004-2404 Mitchell F. Brecher
DOW, LOHNES & ALBERTSON
1255 23rd Street, N.W.
Washington, DC 20037

Steven J. Hogan
President and CEO
LinkUSA
230 2nd Street, SE
Suite 400
Cedar Rapids, IO 52401

John W. Priest
Chairman & Chief
Executive Officer
The Teltronics Group
2150 Whitfield Industrial Way
Sarasota, FL 34243-4046

Jean L. Kiddoo Ann P. Morton SWIDLER & BERLIN, CHTD 3000 K Street, N.W. Suite 300 Washington, DC 20007

John W. Priest
Chairman & Chief
Executive Officer
ComCentral Corp.
2150 Whitfield Industrial Way
Sarasota, FL 34243-4046

Josephine S. Trubek Rochester Tel Center 180 South Clinton Avenue Rochester, NY 14646-0700

Rick L. Anthony
Executive Vice President
Quest Communications Corporation
6600 College Boulevard
Suite 205
Overland Park, Kansas 66211

Randall B. Lowe JONES, DAY, REAVIS & POGUE Metropolitan Square 1450 G Street, N.W. Washington, DC 20005-2088

Paul C. Besozzi
BESOZZI & GAVIN
1901 L Street, N.W.
Suite 200
Washington, D.C. 20036

Greg Casey Senior Vice President, Regulatory Affairs 6707 Democracy Blvd. Bethesda, MD 20817 Danny E. Adams
Rachel J. Rothstein
WILEY, REIN & FIELDING
1775 K Street, N.W.
Washington, DC 20006

Darrell S. Townsley
Special Assistant
Attorney General
Illinois Commerce Commission
180 North LaSalle Street
Suite 810
Chicago, IL 60601

William E. Wyrough, Jr. Associate General Counsel FLORIDA PUBLIC SERVICE COMMISSION 101 East Gaines Street Tallahassee, FL 32399-0850 Ronald G. Choura, Supervisor Telecommunications Section Policy Division Michigan Public Service Commission P.O. Box 30221 Lansing, MI 48909-7721

Colleen M. Dale Senior Counsel Missouti Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Francine J. Berry, Esq. 295 North Maple Avenue Room 3244J1 Basking Ridge, NJ 07920

Rowland L. Curry
Director
Telephone Utility Analysis Div.
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757

Leon M. Kestenbaum Sprint Corporation 1850 M Street, N.W. 11th Floor Washington, DC 20036

Ellen M Averett
Counsel for the Pennsylvania
Public Utility Commission
P.O. Box 3265
G-28, North Office Building
Harrisburg, PA 17105-3265

Mary J. Sisak, Esq. 1801 Pennsylvania Ave., N.W. Washington, DC 20006 Walter Steimel, Jr., Esq. Fish & Richardson 601 13th Street, N.W. 5th Floor North Washington, DC 20005

James D. Heflinger
Vice President and
General Counsel
LiTel Telecommunications
Corporation
4650 Lakehurst Court
Dublin, OH 43017

Roy L. Morris
Deputy General Counsel
1990 M Street, N.W.
Suite 500
Washington, DC 20036

Robert K. Johnson
Deputy Consumer Counselor
Indiana Office of Utility
Consumer Counselor
Indiana Government Cntr North
100 N. Senate Avenue
Room N 501
Indianapolis, IN 46204-2208